

PUBLIC SUBMISSION

Date received

Submission received in two parts –

First 19/08/2024

Second 20/08/2024

Submitter contact details

Submission on behalf of

Goulter's Vinegar Products Ltd

SUBMISSION BEGINS:

Do you consider the code currently effective in supporting the objectives set out in paragraph 21?

1. No because we have since the code of compliance came out, experienced immoral unfair treatment on at least 3 occasions but certainly also before the code came out we have been disadvantaged because of certain directives FSNI may have given to the stores.

Following on from Question 6, are there certain objectives within paragraph 21 that you wish to comment on?

2. Yes:
 - 2.1 Promote fair conduct between RGRs and suppliers;
 - 2.2 Prohibit unfair conduct between RGRs and suppliers;
 - 2.3 Contribute to a trading environment in which businesses compete effectively;
 - 2.4 Promote certainty about the terms of agreement between RGRs and suppliers;

Are there any issues with the content of the Code that may be impacting the Code's effectiveness in supporting the objectives in paragraph 21.

3. No I believe the code is clear and concise.

Are there any opportunities for improving the content of the Code to support the objectives in paragraph 21?

4. I believe the content of the code to be quite clear perhaps giving examples for each point may clarify it more for the suppliers/buyers eg: Prohibit unfair conduct between RGRs and suppliers;
5. Give an example/s of what this could look like.

6. Additionally, Yes, by exposing the truth about what suppliers are experiencing

Are there any issues with the way the Code is being operated or implemented that may be impacting its effectiveness in supporting the objectives in paragraph 21?

7. No if anything it seems like it is business as usual. Perhaps there is misinterpretation from the stores as to what is expected of them. I certainly understand what is fair and not as a supplier however we sit at the opposite end of the table to the buyers who have always had all the power.

Do you have any suggestions about steps to include within the review process to support input into the review?

8. Written examples of what is okay and what is not will I believe broaden the understanding of the code of conduct eg: It is not right to put a supplier on an EDL only and drop all their promotions but then allow the big boy suppliers to run promo's during the year. This is not an even playing field. The category manager told us to do EDL's and now we are losing sales because of this.....

Do you have any other comments you would like us to consider when planning this review process?

9. Let suppliers know it is okay to come forward with the truth of what is going on and assure them that they will be protected. They don't come forward in fear of losing shelf space which in turn could mean their whole business. I would also have a 2 yearly review of the code of conduct just in case in needs tweaking particularly with surveillance systems and AI coming to the fore.